

PROPOSED DISCOVERY PLAN/SCHEDULING ORDER

	DONE	NOT APPLICABLE	DATE
A. ACTIONS REQUIRED <u>BEFORE</u> THE INITIAL CONFERENCE			
1. Rule 26(f) Conference held	X		
2. Rule 26(a)(1) disclosures exchanged			07/21/25
3. Requested:			
a. Medical records authorization		X	
b. Identification of John Doe/Jane Doe defendants		X	
4. Procedures for producing Electronically Stored Information (ESI) discussed	X		
5. Protective Order to be submitted for court approval (see Standing Protective Order on the Chambers website)	x		08/04/2025
B. SETTLEMENT PLAN			
1. Plaintiff to make settlement demand			07/31/25
2. Defendant to make settlement offer			08/11/25
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date for mediation to be completed)			No
4. Settlement Conference (proposed date)			10/15/25
C. PROPOSED DEADLINES			
1. Motion to join new parties			07/31/25
2. Motion to amend pleadings			07/31/25
3. Initial documents requests and interrogatories			09/29/25
4. All fact discovery to be completed			01/19/26
5. Joint status report certifying the close of fact discovery (one week later)			02/02/26

6. Expert discovery (only if needed)		<i>Check here if not applicable</i> <input type="checkbox"/>	
	DONE	NOT APPLICABLE	DATE
a. Affirmative expert reports due			12/15/25
b. Rebuttal expert reports due			01/30/26
c. Depositions of experts to be completed			02/27/26
7. Completion of all discovery (if different from C.4)			03/06/26
8. Joint status report certifying close of all discovery and indicating whether dispositive motion is anticipated (one week later)			03/09/26
9. If any party seeks a dispositive motion, date to a. file request for pre-motion conference (if required), or b. file briefing schedule for the motion			04/20/26
10. Proposed Joint Pre-Trial Order due (if no dispositive motion filed)			05/25/26
D. CONSENT TO MAGISTRATE JUDGE JURISDICTION			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motions?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. All parties consent to Magistrate Judge jurisdiction for trial?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY			
1. Motion for collective action certification in FLSA cases			
a. Response due			
b. Reply due			
2. Motion for Rule 23 class certification			03/20/2026
a. Response due			04/17/2026
b. Reply due			05/01/2026

This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.

SO ORDERED:

LARA K. ESHKENAZI
United States Magistrate Judge

Date